

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NO: 18-CR-2945-WJ

JANY LEVEILLE, *et al.*,

Defendants.

**DEFENDANTS' JOINT UNOPPOSED MOTION TO EXTEND THE DISCOVERY  
COMPLETION DATE AND EXPERT DISCLOSURES (DOC. 172)**

COMES NOW defendants Jany Leveille, Siraj Ibn Wahhaj, Hujrah Wahhaj, Subhanah Wahhaj, and Lucas Morton, through respective undersigned counsel, and jointly file this motion to extend the January 31, 2020 deadline for the defense to complete discovery, including defense expert disclosures, for approximately sixty (60) days, or unto approximately, Tuesday, March 31, 2020. (Doc. 172). As grounds for this motion, defendants state:

1. The parties have finally concluded informal discovery negotiations through defense written requests and written government responses to those requests. The government advised it has produced all the discovery it has in its current possession. Much of the discovery that was requested by the defense, but not yet disclosed, is needed to hire and discuss with possible defense expert witnesses. The

defense will be filing a Motion to Compel discovery that have not been turned over by the government.

2. Selection of defense expert witnesses are still being assessed by the defense teams, and being approved by the Court. The defense experts will need time to review materials to be disclosed prior to formulating any opinions or drafting any reports.

3. As a result, the defendants jointly seek an extension of the time for completion of defense discovery and the defense expert disclosures (including reports) for an additional sixty (60) days, or to Tuesday, March 31, 2020.

4. On January 23, 2020, AUSAs Kimberly Brawley and George Kraehe, stated they have have no objection to this motion.

WHEREFORE, joint defense counsel respectfully requests this Court to extend the January 31, 2020 defense discovery completion date, including defense expert disclosures for approximately sixty (60) days, or to Tuesday, March 31, 2020.

Respectfully submitted,

/s/ electronically filed

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**CERTIFICATE OF SERVICE**

I hereby certify that I filed the  
foregoing document electronically  
through the Court's CM/ECF system  
on this 26th day of January, 2020.

/s/ Electronically Filed

Amy Sirignano